

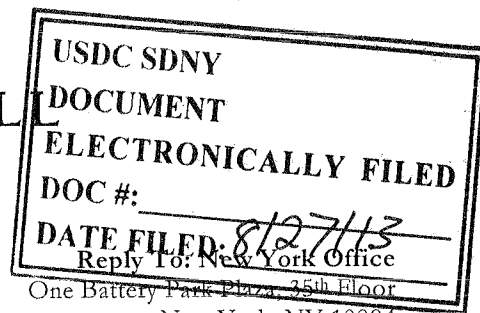
MEMO ENDORSED

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August 21, 2013

VIA HAND DELIVERY

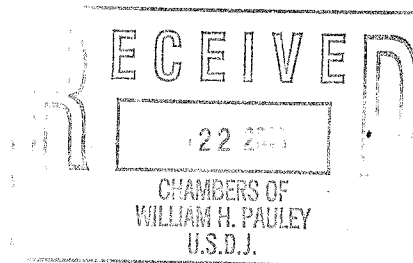
Hon. William H. Pauley III

United States District Court, Southern District of New York

500 Pearl Street

Courtroom: 2B

New York, NY 10007



RE: Liberty Mutual Insurance Company a/s/o Waterfront Enterprises, Inc., and
Waterfront Enterprises, Inc. v. Bouchard Transportation Co., Inc., et al.
12-CIV-7061 (WHP)

Dear Judge Pauley:

We represent Plaintiffs in the above-referenced matter.


We are writing on behalf of all parties to request that Your Honor extend the current deadlines and events scheduled in this matter. Your Honor previously extended the deadlines one time, when defense counsel was substituted. The current deadlines and events are as follows: fact discovery is August 30, 2013; expert discovery is September 30, 2013; a joint pre-trial order is due November 27, 2013; and a final pre-trial conference is scheduled for December 13, 2013. All parties agree that additional time is necessary to complete fact and expert discovery, including responding to discovery demands and conducting depositions. To date, initial disclosures have been exchanged, including physical documents, and discovery demands have been propounded.

★ We propose the following as new dates: (1) All fact discovery shall be completed by October 29, 2013; (2) All expert discovery shall be completed by December 6, 2013; (3) The parties are directed to submit a joint pre-trial order by January 27, 2014; and (4) The parties are directed to appear for a final pre-trial conference on February 11, 2014 at 10:30 a.m.

Thank you for Your Honor's consideration of the foregoing and attention in this matter.

Application granted. The parties are directed to appear for a final pre-trial conference on February 14, 2014 at 10:00 a.m. No further extensions will be granted.


SO ORDERED:


WILLIAM H. PAULEY III U.S.D.J.

8/27/13

Very truly yours,

THE CHARTWELL LAW OFFICES, LLP

By: 
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